

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

PEDRO ROSELLÓ, ET AL.

Plaintiffs

vs.

BROWN & WILLIAMSON TOBACCO
COMPANY, ET AL.

Defendants

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Civil No.: 97-01910 (JAF)

**MOTION REGARDING FILING OF
CHAPTER 11 OF BEKENTON U.S.A., INC.**

TO THE HONORABLE COURT:

NOW COMES plaintiff, Bekenton USA, Inc., through its undersigned attorneys, **TRONCOSO & SCHELL**, and very respectfully informs this Honorable Court that it has filed for protection under Chapter 11 of the Bankruptcy Code, in the United States Bankruptcy Court for the Southern District of Florida, Case No. 05-60031-RAM.

WHEREFORE, it is very respectfully requested that this Honorable Court take notice of the filing for protection under Chapter 11 of the Bankruptcy Code of plaintiff Bekenton U.S.A., Inc.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27th day of December, 2005.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys: Benjamín Acosta, Jr., Esq., Salvador Antonetti-Zequeira, Esq., Francisco A. Besosa, Esq., Heriberto J. Burgos, Esq., Edgardo Cargagena Santiago, Esq., José A. Fuentes-Agostini, Esq., William A. Graffam, Esq., Manuel A. Guzmán-Rodríguez, Esq., Paul H. Hulsey, Esq., Juan A. Ramos-Díaz, Esq., Héctor Reichard, Jr., Esq., vicente Santori-Coll, Esq., and Gina Ismalia Gutiérrez-Galang, Esq.

Notice will be served via FedEx upon the following parties: National Association of Attorneys General ("NAAG"), at its principal place of business, 750 First Street, NE, Suite 1100, Washington, DC 20002; and the Honorable Steve Carter, Office of the Indiana Attorney General, I.G.C. South 5th Floor, 302 West Washington Street, Indianapolis, IN 46204.

s/ Francisco M. Troncoso

FRANCISCO M. TRONCOSO 120007

s/ Richard Schell-Asad

RICHARD SCHELL-ASAD 203207

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